

Case 14-36770-rld11 Doc 75 Filed 04/23/15
UNITED STATES BANKRUPTCY COURT
DISTRICT OF OREGON

In re) Case No. _____
)
) NOTICE OF INTENT TO Sell Real or
) Personal Property, Compensate Real Estate
) Broker, and/or Pay any Secured Creditor's Fees
) and Costs; Motion for Authority to Sell Property
) Free and Clear of Liens; and Notice of Hearing
) **[Note: Do not use to sell personally identifiable**
Debtor(s)) **information about individuals!]**

NOTICE IS GIVEN THAT _____, the
_____ (i.e., debtor, trustee, etc.), intends to sell the property described below and moves
for authority to sell said property free and clear of liens pursuant to 11 USC §363(f). The movant's name, address, and
telephone # are: _____.

If you wish to object to any aspect of the sale or fees disclosed in ¶7 or ¶15 you must: (1) attend the hearing set in ¶16 below
and, (2) within 23 days of the later of either (a) the date next to the signature below; or (b) the service date in ¶17 below, file
with the Clerk of Court (i.e., if the 5-digit portion of the Case No. begins with "3" or "4", at 1001 SW 5th Ave. #700, Portland
OR 97204; or if it begins with "6" or "7", at 405 E 8th Ave #2600, Eugene OR 97401): (a) a written response stating the specific
facts upon which the objection is based, and (b) proof that a copy of the response was served on the movant.

This document shall constitute the notice required by LBR 2002-1. (COMPLETE ALL SECTIONS.)

1. The specific subsections of 11 USC §363(f) movant relies upon for authority to sell the property free and clear of liens are:
2. Buyer's Name & Relation to Debtor:
3. General description of the property (NOTE: If real property, state street address here. Also attach legal description as
an Exhibit to the original filed with the court):

4. A copy of the full property description or inventory may be examined or obtained at:

5. The property may be previewed at (include time and place):

6. Other parties to the transaction and their relationship to the debtor are:

7. Gross sales price: \$_____. All liens on the property total: \$_____, of which Movant believes
a total of \$_____ need not be paid as secured claims (because the lien is invalid, avoidable, etc., the lienholder
consents to less than full payment, or part or all of the underlying debt is not allowable). Secured creditor(s) also seek(s)
reimbursement of \$_____ for fees and costs. Total sales costs will be: \$_____. All tax
consequences have been considered and it presently appears the sale will result in net proceeds to the estate after payment
of valid liens, fees, costs and taxes of approximately: \$_____.

8. The sale is is not (**mark one**) of substantially all of the debtor's assets. Terms and conditions of sale:

**For specific details about terms and conditions of sale, see Notice and Motion to Approve Settlement and Compromise and its
attached Term Sheet filed April 23, 2015 [Docket No. 71]. General terms are that the sale is subject to court approval, and is also
conditioned on approval of proposed settlement. Sale is also subject to approval by the Board of Directors for the Museum. The
Museum's agreement to the sale is subject to side agreements with parties to CFA, including the participant that will become the
Museum's landlord.**

Debtor and buyers hereby request waiver of the 14-day stay under FRBP 6004(h).

9. Competing bids must be submitted to the movant no later than (date) _____, and must exceed the above offer by
at least _____ (and be on the same or more favorable terms to the estate).

10. Summary of all available information regarding valuation, including any independent appraisals:

11. If ¶7 indicates little or no equity for the estate, the reason for the sale is:

and expenses and taxes resulting from the sale will be paid as follows:

12. (Ch. 11 cases only) The reason for proposing the sale in advance of approval of a plan of reorganization is:

13. The following information relates to lien holders (who are listed in PRIORITY order):

<u>Name</u>	<u>Service Address (See FRBP 7004)</u>	<u>Approximate Lien Amount</u>	<u>Indicate Treatment at Closing (i.e., Fully Pd., Partially Pd., or Not Pd.)</u>

14. Any liens not fully paid at closing shall attach to the sale proceeds in the same order of priority they attach to the property. Any proceeds remaining after paying liens, expenses, taxes, commissions, fees, costs or other charges as provided in this motion, shall be held in trust until the court orders payment.

15. [If real property] The court appointed real estate broker, _____, will be paid _____.

16. A HEARING ON THIS MOTION AND ANY OBJECTIONS TO THE SALE AND/OR FEES WILL BE HELD

ON _____ AT _____ IN _____ and testimony will be received if offered and admissible.

17. [Unless movant is a Ch. 7 trustee] I certify that on _____ a copy of this document was served, pursuant to FRBP 7004, on the debtor(s), trustee, if any, U.S. Trustee, each named lien holder at the address listed above, Creditors' Committee Chairperson, if any, and their respective attorneys; and that a copy was also served that date, pursuant to FRBP 2002(a), on all creditors and parties requesting special notice as listed in the Court's records that were obtained on _____, a copy of which is attached to the original document filed with the Bankruptcy Court.

18. FOR FURTHER INFORMATION CONTACT: _____

DATE: _____

Signature & Relation to Movant

(If debtor is movant) Debtor's Address & Taxpayer ID#(s) (last 4 digits)

EXHIBIT "A"

A tract of land in Section 23, Township 4 South, Range 4 West of the Willamette Meridian in Yamhill County, Oregon, and being more particularly described as follows:

BEGINNING at an iron rod that is North 90°00'00" West (WEST) 3740.00 feet and North 00°23'30" East 30.00 feet from the Southeast corner of the Rueben Harris Donation Land Claim No. 80, said point being on the North margin of Three Mile Lane; thence North 00°23'30" East 939.63 feet to an iron rod; thence South 89°58'40" East 370.00 feet to an iron rod; thence North 00°23'30" East 727.91 feet to an iron rod; thence North 89°03'00" West 1144.96 feet to an iron rod; thence South 00°24'52" West 746.45 feet to an iron rod; thence South 89°58'40" East 236.21 feet to an iron rod; thence South 00°22'32" West 939.84 feet to an iron rod on the North margin of Three Mile Lane (30.00 feet from centerline); thence North 90°00'00" East (EAST) 538.76 feet along said North margin to point of beginning.

EXCEPTING THEREFROM that portion conveyed to the City of McMinnville, a municipal corporation, by Dedication of Easement and Right of Way recorded in Instrument No. 200304463, Deed Records.

Label Matrix for local noticing
0979-3
Case 14-36770-rld11
District of Oregon
Portland
Thu Apr 23 10:26:50 PDT 2015

CT Corp.
PO Box 4349
Carol Stream, IL 60197-4349

Egan Gardens
c/o Ellen Egan, Reg. Agent
2245 Ferry St. NE
Salem, OR 97303

Evergreen Vintage Aircraft, Inc.
1271 NE Hwy 99W, PMB 502
McMinnville, OR 97128-2720

IMAX Corporation
2525 Speakman Drive
Mississauga, ONT L5K 1B1
CANADA

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Portland, OR 97201-5865

Miller Nash Graham & Dunn LLP
c/o Teresa H. Pearson
111 SW Fifth Avenue, #3400
Portland, OR 97204-3614

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1211 SW 5th Ave #1600-1900
Portland, OR 97204-3735

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Portland, OR 97205-3066

Oregon Secretary of State
255 Capitol St., NE
Salem, OR 97310-1389

Pacific Coast Bankers' Bank
c/o Wendell Kusnerus
Davis Wright Tremaine LLP
1300 SW Fifth Avenue, Suite 2400
Portland, OR 97201-5682

JOSEPH A SAKAY
1221 2nd Ave #500
Seattle, WA 98101-2989

CT Corp.
388 State Street
Suite 420
Salem, OR 97301-3581

Egan Gardens
9805 River Rd.
Salem, OR 97303-9737

Evergreen Helicopters, Inc.
Alex I. Poust
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Portland, OR 97204-3719

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Wilmington, DE 19801-3034

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1271 NE Hwy 99W
PMB 502
McMinnville, OR 97128-2720

US Trustee, Portland
620 SW Main St #213
Portland, OR 97205-3026

Umpqua Bank
c/o Joseph A.G. Sakay
1221 Second Avenue
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Seattle, WA 98101-2989

Umpqua Bank
Hillis Clark Martin & Peterson
Attn: Joseph A.G. Sakay
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Umpqua Bank
PO Box 1820
Roseburg, OR 97470-0417

Ventures Acquisition Company, LLC
1271 NE Hwy 99W
PMB 502
McMinnville, OR 97128-2720

Ventures Holdings, Inc.
1271 NE Hwy 99W
PMB 502
McMinnville, OR 97128-2720

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Dept of Justice/Civil Enforce/Recovery
1162 Court St NE
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World Fuel Services, Inc.
9800 NW 4th Street, Suite 400
Miami, FL 33178

World Fuel Services, Inc.
James P Laurick, Kilmer, Voorhees
732 NW 19th Ave
Portland, OR 97209-1302

Yamhill County Tax Assessor
535 NE 5th Street
Room 42
McMinnville, OR 97128-4504

Yamhill County Tax Collector
c/o Jeffrey C. Misley
Sussman Shank LLP
1000 SW Broadway, Suite 1400
Portland, OR 97205-3089

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)Alfred T. Giuliano, Chapter 7 Trustee for (u)Erickson Helicopters, Inc. fka Evergreen H (u)Evergreen Aviation and Space Museum and th

(u)Glen Del, LLC (u)Steven Maier (u)Miller Nash LLP

(u)State of Oregon, Department of Justice (u)Tina Stanley, as Trustee for the Grace Cat (u)World Fuel Services, Inc.

(u)Yamhill County

End of Label Matrix
Mailable recipients 42
Bypassed recipients 10
Total 52